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14 Attorneys for Defendant:  
CARLOS E. KEPKE

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 CARLOS E. KEPKE,

23 Defendant.  
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27  
28

Case No. 3:21-CR-00155-JD

**DEFENDANT CARLOS KEPKE'S  
MOTION FOR SEQUESTRATION  
ORDER**

Courtroom: 11, 19th Floor  
Judge: Hon. James Donato

**MOTION FOR SEQUESTRATION ORDER**

Defendant Carlos Kepke (“Mr. Kepke”), by and through undersigned counsel, respectfully moves the Court, pursuant to Fed. R. Evid. 611(a), for a sequestration order precluding parties from discussing with a testifying witness anything related to the substance of the witness’s testimony once the witness begins testifying. Such a sequestration is a “procedure[] effective for determining the truth.” Fed. R. Evid. 611(a)(1). It ensures that the testifying witness will answer truthfully and will not be swayed to change their testimony.

Accordingly, Mr. Kepke requests an order precluding either party from discussing with a testifying witness anything related to the substance of a witness’s testimony once that witness begins testifying.

Respectfully submitted,

Dated: November 25, 2022

By: /s/ Grant P. Fondo  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **November 25, 2022**. I further certify that all participants in the case are registered CM/ ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **November 25, 2022** in Los Altos, California.

/s/ Grant P. Fondo

GRANT P. FONDO